

# EXHIBIT 1

Electronically Filed  
Kinnis Williams, Sr.  
Circuit Clerk  
Cheri Johnson  
2025LA000403  
St. Clair County  
4/15/2025 10:39 AM  
32278882

IN THE CIRCUIT COURT OF THE TWENTIETH JUDICIAL CIRCUIT  
ST. CLAIR COUNTY, ILLINOIS

JUDY BACZEWSKI, )  
Plaintiff, )  
vs. )  
SCHNUCK MARKETS INC, a corporation, ) NO: 2025LA000403  
c/o Registered Agent: )  
Registered Agent Solutions, Inc. )  
901 South 2<sup>nd</sup> Street, Suite 201 )  
Springfield, IL 62704 )  
Defendant. )

**COMPLAINT**

**COUNT I**  
**Negligence/Premises Liability**  
**(Judy Baczewski v. Schnuck Markets, Inc., a corporation)**

COMES NOW the Plaintiff, Judy Baczewski, by and through her attorneys, Rich, Rich, Cooksey & Chappell, P.C. and for her cause of action against the Defendant Schnuck Markets, Inc., a corporation (hereinafter referred to as "Schnuck"), and respectfully represents unto the Court as follows:

1. That at all times relevant hereto the Defendant, Schnuck, is authorized to do business in the State of Illinois and does business as a retailer in St. Clair County, Illinois and invites patrons and others onto its premises to conduct business.
2. That at all times relevant hereto the Defendant, Schnuck, possessed, operated, managed, maintained and controlled or had a duty to possess, operate, manage, maintain and control, both directly and indirectly, individually and through its agents, servants and employees, the premises upon which it conducted business located at 5720 North Belt West in Belleville,

Illinois.

3. That the Defendant invited the general public, including the Plaintiff, to enter and exit the subject premises for the purpose of conducting business activities within the aforementioned premises.

4. That it then and there became and was the duty of the Defendant, individually and through its agents, servants, and employees, to keep the premises in a reasonably safe condition for the Plaintiff and other people lawfully in and about the premises and, further, not to create or allow any dangerous conditions to exist on or about the premises.

5. That at the aforementioned location, and on or about December 27, 2023, the Defendant, Schnuck, well knowing its duty in this regard, carelessly and negligently caused and permitted the premises to become and remain in a dangerous condition for persons using said premises, especially patrons, although the Defendant knew, or in the exercise of ordinary and reasonable care should have known, of said dangerous condition.

6. That at all times relevant hereto, the Plaintiff, Judy Baczeswki, was lawfully on the aforesaid premises as an invitee and exercising due care for her own safety.

7. That on December 27, 2023, the Plaintiff, Judy Baczeswki, tripped and fell on a deformed rug at the entrance of the Defendant's premises, causing her severe injuries.

8. That at the aforesaid time and place, the Defendant, by and through its agents and servants, committed one or more of the following acts of negligence and/or omissions which directly and proximately caused the accident to occur:

- a. It failed to manage, inspect, clean, and maintain its premises in a safe condition;
- b. It caused and allowed a deformed rug to remain on the floor, at the entrance of the store;
- c. It failed to have a safe procedure with regard to the inspection of rugs on the

aforesaid premises;

- d. It failed to maintain the rugs at the entrance of the store;
- e. It failed to ensure that the rugs in the entrance area were free from hazardous conditions;
- f. It failed to provide a good, safe and proper place for the Plaintiff to, use, occupy and walk on while on the common areas of the premises;
- g. It allowed and permitted the premises to become and remain in an unsafe, defective, and/or dangerous condition, which it knew or should have known existed, namely by causing and allowing the deformed rug to remain at the entrance of its premises;
- h. It failed to inspect the premises to be certain it was in good, safe and/or proper condition; and
- i. It failed to warn the Plaintiff and others of the unsafe, defective and/or dangerous condition of the said premises.

9. The foregoing acts and omissions proximately and directly caused Plaintiff, to sustain personal injuries, both physical and mental, some or all of which are permanent, and resulting in damages, including past and future: physical pain and suffering, mental anguish and emotional distress, physical and mental impairment and disability, disfigurement, loss of enjoyment of life, lost wages, salary and income and diminished earning capacity, and reasonable and necessary health care and medical expenses, and will be reasonably certain to suffer these losses in the future.

WHEREFORE, the Plaintiff, Judy Baczeski, prays judgment against the Defendant, Schnuck Markets, Inc., a corporation, for a fair and just award in excess of \$50,000.00 (Fifty Thousand Dollars) plus costs of this suit.

Respectfully submitted,

/s/ Kristina D. Cooksey  
BY: RICH, RICH, COOKSEY & CHAPPELL, P.C.  
Mr. Thomas C. Rich #06186229  
Mrs. Kristina D. Cooksey #6299549  
Mrs. Michelle M. Rich #6310004  
Mr. Aaron J. Chappell #6311028  
Attorneys at Law  
6 Executive Drive, Suite 3  
Fairview Heights, IL 62208  
618-632-0044 PHONE  
618-632-9749 FAX  
team@rrccfirm.com

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vs. ) NO: 2025LA000403  
SCHNUCK MARKETS INC, a corporation, )  
Defendant. )

## AFFIDAVIT

COME NOW Rich, Rich, Cooksey & Chappell, P.C., attorneys for the Plaintiff, in the above-titled action and at the time of the filing of this Complaint have reasonable grounds to believe that the damage to the Plaintiff as a result of the injuries sustained herein will be in excess of Fifty Thousand Dollars (\$50,000.00).

Respectfully submitted,

4/15/25

/s/ Kristina D. Cooksey  
BY: RICH, RICH, COOKSEY & CHAPPELL, P.C.  
Mr. Thomas C. Rich #06186229  
Mrs. Kristina D. Cooksey #6299549  
Mrs. Michelle M. Rich #6310004  
Mr. Aaron J. Chappell #6311028  
Ms. Caitlin Rich #6334176  
Attorneys at Law  
6 Executive Drive, Suite 3  
Fairview Heights, IL 62208  
618-632-0044 PHONE  
618-632-9749 FAX  
[team@rrccfirm.com](mailto:team@rrccfirm.com)



## SERVICE OF PROCESS RECEIPT

### NOTICE OF CONFIDENTIALITY

This notice and the information it contains are intended to be a confidential communication only to the individual and/or entity to whom it is addressed. If you have received this notice in error, immediately call our SOP Department at (888) 705-7274.

**RE:**

This receipt is to inform you that Registered Agent Solutions, Inc. has received a Service of Process on behalf of the above-referenced entity as your registered agent and is hereby forwarding the attached document(s) for your immediate review. A Summary of the service is shown below; however, it is important that you review the attached document(s) in their entirety for complete and detailed information.

**SERVICE INFORMATION**

Service Date:  
Service Time:  
Service Method:

**RASI REFERENCE INFORMATION**

Service No.:  
RASI Office:  
Rec. Int. Id.:

**CASE INFORMATION**

Case Number:  
File Date:  
Jurisdiction:  
Case Title:

**ANSWER / APPEARANCE INFORMATION****AGENCY / PLAINTIFF INFORMATION**

Firm/Issuing Agent:  
Attorney/Contact:  
Location:  
Telephone No.:

**DOCUMENT(S) RECEIVED & ATTACHED****ADDITIONAL NOTES:**

**Questions?** Should you have any questions or need additional assistance, please contact the SOP Department at (888) 705-7274.

You have been notified of this Service of Process by Insta-SOP Delivery, a secure email transmission. The transmitted documents have also been uploaded to your Compliance account. RASI offers additional methods of notification including Telephone Notification and FedEx Delivery. If you would like to update your account's notification preferences, please log into your Compliance account at [www.rasi.com](http://www.rasi.com).

*Thank you for your continued business!*

<b>STATE OF ILLINOIS, CIRCUIT COURT</b>	<b>SUMMONS</b>	<i>For Court Use Only</i>
St. Clair	COUNTY	
<b>Instructions ▾</b> Enter above the county name where the case was filed.		
Enter your name as Plaintiff/Petitioner.		
Below "Defendants/ Respondents," enter the names of all people you are suing.		
Enter the Case Number given by the Circuit Clerk.		
<b>JUDY BACZEWSKI</b> <b>Plaintiff / Petitioner</b> ( <i>First, middle, last name</i> )		
V.  <b>Defendants / Respondents</b> ( <i>First, middle, last name</i> )		
<b>SCHNUCK MARKETS INC</b>  <hr/>		
<input type="checkbox"/> <b>Alias Summons</b> ( <i>Check this box if this is not the 1<sup>st</sup> Summons issued for this Defendant.</i> )		
		<b>2025LA000403</b>
		<b>Case Number</b>

### **IMPORTANT: You have been sued.**

- Read all documents attached to this Summons.
- You MUST file an official document with the court within the time stated on this Summons called an *Appearance* and a document called an *Answer/Response*. If you do not file an *Appearance* and *Answer/Response* on time, the judge may decide the case without hearing from you. This is called "default." As a result, you could lose the case.
- All documents referred to in this Summons can be found at [ilcourts.info/forms](http://ilcourts.info/forms). Other documents may be available from your local Circuit Court Clerk's office or website.
- After you fill out the necessary documents, you need to electronically file (e-file) them with the court. To e-file, you must create an account with an e-filing service provider. For more information, go to [ilcourts.info/efiling](http://ilcourts.info/efiling). If you cannot e-file, you can get an exemption that allows you to file in-person or by mail.
- You may be charged filing fees, but if you cannot pay them, you can file an Application for Waiver of Court Fees.
- It is possible that the court will allow you to attend the first court date in this case in-person or remotely by video or phone. Contact the Circuit Court Clerk's office or visit the Court's website to find out whether this is possible and, if so, how to do this.
- Need help? Call or text Illinois Court Help at 833-411-1121 or go to [ilcourthelp.gov](http://ilcourthelp.gov) for information about going to court, including how to fill out and file documents. You can also get free legal information and legal referrals at [illinoislegalaid.org](http://illinoislegalaid.org). All documents referred to in this Summons can be found at [ilcourts.info/forms](http://ilcourts.info/forms). Other documents may be available from your local Circuit Court Clerk's office or website.
- ¿Necesita ayuda? Llame o envíe un mensaje de texto a Illinois Court Help al 833-411-1121, o visite [ilcourthelp.gov](http://ilcourthelp.gov) para obtener información sobre los casos de la corte y cómo completar y presentar formularios.

#### **Plaintiff/Petitioner:**

**Do not use this form** in these types of cases:

<ul style="list-style-type: none"> <li>• All criminal cases</li> <li>• Eviction</li> <li>• Small Claims</li> <li>• Divorce</li> </ul>	<ul style="list-style-type: none"> <li>• Order of protection</li> <li>• Paternity</li> <li>• Stalking no contact orders</li> <li>• Civil no contact orders</li> </ul>	<ul style="list-style-type: none"> <li>• Adult guardianship</li> <li>• Detinue</li> <li>• Foreclosure</li> <li>• Administrative review cases</li> </ul>
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For eviction, small claims, divorce, and orders of protection, use the forms available at [ilcourts.info/forms](http://ilcourts.info/forms). If your case is a detinue, visit [illinoislegalaid.org](http://illinoislegalaid.org) for help.

**If you are suing more than 1 Defendant/Respondent**, attach an *Additional Defendant/Respondent Address and Service Information* form for each additional Defendant/Respondent.

In 1a, enter the name and address of the first Defendant/ Respondent you are serving. If you are serving a Registered Agent, include the Registered Agent's name and address here.

In 1b, enter a second address for the first Defendant/ Respondent, if you have one.

In 1c, check how you are sending your documents to this Defendant/ Respondent.

Check here if you are serving more than 1 Defendant/ Respondent. Attach an *Additional Defendant/ Respondent Address and Service Information* form for each additional Defendant/Respondent and write the number of forms you attached.

In 2a, enter the amount of money owed to you. Check 2b if you are asking for the return of tangible personal property.

In 3, enter your complete address, telephone number, and email address, if you have one.

#### 1. Defendant/Respondent's address and service information:

a. Defendant/Respondent's primary address/information for service:

Name (*First, Middle, Last*): Schnuck Markets Inc.

Registered Agent's name, if any: Registered Agent Solutions, Inc.

Street Address, Unit #: 901 South 2nd Street, Suite 201

City, State, ZIP: Springfield, IL 62704

Telephone: Email:

b. If you have more than one address where Defendant/Respondent might be found, list that here:

Name (*First, Middle, Last*):

Street Address, Unit #:

City, State, ZIP:

Telephone: Email:

c. Method of service on Defendant/Respondent:

Sheriff  Sheriff outside Illinois:

County & State

Special process server  Licensed private detective

I am serving more than 1 Defendant/Respondent.

I have attached \_\_\_\_\_ Additional Defendant/Respondent Address Number and Service Information forms.

#### 2. Information about the lawsuit:

a. Amount claimed: \$ 50,000.00

b. I am asking for the return of tangible personal property (items in the Defendant/Respondent's possession).

#### 3. Contact information for the Plaintiff/Petitioner:

Name (*First, Middle, Last*): Judy Baczewski

Street Address, Unit #: Rich Rich Cooksey & Chappell, P.C., 6 Executive Drive, Suite 3

City, State, ZIP: Fairview Heights, IL 62208

Telephone: (618) 632-0044 Email: team@rrccfirm.com

**GETTING COURT DOCUMENTS BY EMAIL:** You should use an email account that you do not share with anyone else and that you check every day. If you do not check your email every day, you may miss important information, notice of court dates, or documents from other parties.

#### Important information for the person getting this form

You have been sued. Read all of the documents attached to this *Summons*. To participate in the case, you must follow the instructions listed below. If you do not, the court may decide the case without hearing from you and you could lose the case. *Appearance* and *Answer/Response* forms can be found at: ilcourts.info/forms.

#### 4. Instructions for person receiving this *Summons* (Defendant):

a. To respond to this *Summons*, you must file *Appearance* and *Answer/Response* forms with the court within 30 days after you have been served (*not counting the day of service*) by e-filing or at:

Address: 10 Public Square A300

City, State, ZIP: Belleville, IL 62220

Check 4a or 4b. If Defendant/Respondent only needs to file an *Appearance* and *Answer/Response* within 30 days, check box 4a. Otherwise, if the clerk gives you a court date, check box 4b.

In 4a, fill out the address of the court building where the Defendant may file or e-file their Appearance and Answer/ Response.

In 4b, fill out:

- The court date and time the clerk gave you.
- The courtroom and address of the court building.
- The call-in or video information for remote appearances (if applicable).
- The clerk's phone number and website. All of this information is available from the Circuit Clerk.

b. Attend court:

On: \_\_\_\_\_ at \_\_\_\_\_  a.m.  p.m. in \_\_\_\_\_  
*Date* *Time* *Courtroom*

**In-person at:**

Courthouse Address \_\_\_\_\_ City \_\_\_\_\_ State \_\_\_\_\_ ZIP \_\_\_\_\_

OR

**Remotely** (You may be able to attend this court date by phone or video conference. This is called a "Remote Appearance"):

By telephone: \_\_\_\_\_  
*Call-in number for telephone remote appearance*

By video conference: \_\_\_\_\_  
*Video conference website*

\_\_\_\_\_  
*Video conference log-in information (meeting ID, password, etc.)*

Call the Circuit Clerk at: \_\_\_\_\_ or visit their website  
*Circuit Clerk's phone number*

at: \_\_\_\_\_ to find out more about how to do this.  
*Website*

**STOP!**

The Circuit Clerk will fill in this section.

**Witness this Date:** \_\_\_\_\_

4/30/2025  
Cheri Johnson

**Clerk of the Court:** \_\_\_\_\_



  
Seal of Court  
DENNIS WILLIAMS, JR. Circuit Clerk

**STOP! The officer or process server will fill in the Date of Service**

**Note to officer or process server:**

- If 4a is checked, this *Summons* must be served within 30 days of the witness date.
- If 4b is checked, this *Summons* must be served at least 21 days before the court date, unless 2b is also checked.
  - If 4b and 2b are checked, the *Summons* must be served at least 3 days before the court date.

Date of Service: \_\_\_\_\_

*(Date to be entered by an officer or process server on the copy of this Summons left with the Defendant or other person.)*

This form is approved by the Illinois Supreme Court and must be accepted in all Illinois Courts.  
 Forms are free at [ilcourts.info/forms](http://ilcourts.info/forms).

<b>STATE OF ILLINOIS, CIRCUIT COURT</b>  St. Clair <b>COUNTY</b>	<b>PROOF OF SERVICE OF SUMMONS AND COMPLAINT/PETITION</b>	<i>For Court Use Only</i>
<b>Instructions</b> Enter above the county name where the case was filed. Enter your name as Plaintiff/Petitioner. Enter the names of all people you are suing as Defendants/Respondents. Enter the Case Number given by the Circuit Clerk.		<b>JUDY BACZEWSKI</b> <b>Plaintiff / Petitioner (First, middle, last name)</b>  <b>V.</b>  <b>SCHNUCK MARKETS INC</b> <b>Defendant / Respondent (First, middle, last name)</b>  <input type="checkbox"/> <b>Alias Summons</b> ( <i>Check this box if this is not the 1<sup>st</sup> Summons issued for this Defendant.</i> )
<b>2025LA000403</b> <b>Case Number</b>		

**\*\*Stop. Do not complete the form. The sheriff or special process server will fill in the form. Give them one copy of this blank Proof of Service form for each Defendant/Respondent.\*\***

My name is \_\_\_\_\_ and I state  
*First, Middle, Last*

I served the **Summons and Complaint/Petition** on the Defendant/Respondent  
*as follows:*  
*First, Middle, Last*

Personally on the Defendant/Respondent:

Male  Female  Non-Binary      Approx. Age: \_\_\_\_\_ Race: \_\_\_\_\_  
 On this date: \_\_\_\_\_ at this time: \_\_\_\_\_  a.m.  p.m.

Address, Unit#: \_\_\_\_\_

City, State, ZIP: \_\_\_\_\_

On someone else at the Defendant/Respondent's home who is at least 13 years old and is a family member or lives there:

On this date: \_\_\_\_\_ at this time: \_\_\_\_\_  a.m.  p.m.

Address, Unit#: \_\_\_\_\_

City, State, ZIP: \_\_\_\_\_

And left it with: \_\_\_\_\_

*First, Middle, Last*

Male  Female  Non-Binary      Approx. Age: \_\_\_\_\_ Race: \_\_\_\_\_

and by sending a copy to this defendant in a postage-paid, sealed envelope to the above address on this date: \_\_\_\_\_ .

On the Corporation's agent, \_\_\_\_\_

*First, Middle, Last*

Male  Female  Non-Binary      Approx. Age: \_\_\_\_\_ Race: \_\_\_\_\_

On this date: \_\_\_\_\_ at this time: \_\_\_\_\_  a.m.  p.m.

Address: \_\_\_\_\_

City, State, ZIP: \_\_\_\_\_

I was not able to serve the **Summons** and Complaint/Petition on Defendant/Respondent:

First, Middle, Last

I made the following attempts to serve the **Summons** and Complaint/Petition on the Defendant/Respondent:

1. On this date: \_\_\_\_\_ at this time: \_\_\_\_\_  a.m.  p.m.

Address: \_\_\_\_\_

City, State, ZIP: \_\_\_\_\_

Other information about service attempt: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. On this date: \_\_\_\_\_ at this time: \_\_\_\_\_  a.m.  p.m.

Address: \_\_\_\_\_

City, State, ZIP: \_\_\_\_\_

Other information about service attempt: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3. On this date: \_\_\_\_\_ at this time: \_\_\_\_\_  a.m.  p.m.

Address: \_\_\_\_\_

City, State, ZIP: \_\_\_\_\_

Other information about service attempt: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

DO NOT complete this section. The sheriff or private process server will complete it.

If you are a special process server, sheriff outside Illinois, or licensed private detective, your signature certifies that everything on the **Proof of Service of Summons** is true and correct to the best of your knowledge. You understand that making a false statement on this form could be perjury.

By:

Under the Code of Civil Procedure, 735 ILCS 5/1-109, making a statement on this form that you know to be false is perjury, a Class 3 Felony.

Signature by:  Sheriff

Sheriff outside Illinois:

FEES

Service and Return: \$ \_\_\_\_\_

Miles \_\_\_\_\_ \$ \_\_\_\_\_

Total \$ \_\_\_\_\_

County and State

Special process server

Licensed private  
detective

Print Name \_\_\_\_\_

If **Summons** is served by licensed private detective or private detective agency:

License Number: \_\_\_\_\_

**Print Form**

**Save Form**

**Reset Form**

**NOTICE OF ATTORNEY'S LIEN**

**By Personal Service**  
Schnuck Markets, Inc.

*My Client: Judy Baczewski*  
*Date of Loss: 12/27/23*

Please take notice that the above client has retained my services as her attorney, for suit or collection, a claim, demand, or cause of action against you growing out of personal injuries sustained on or about the above date of loss.

You are hereby further notified that above claimant has agreed to pay as compensation for services rendered and to be rendered a sum equal to 1/3 of whatever amount that may be recovered from said claim by judgment, settlement, or otherwise from any individual or entity, including but not limited to any first-party or third-party insurer.

You are further notified that pursuant to Section 1 of the Attorneys Lien Act, 770 ILCS § 5/1, a lien is claimed upon the said claim, demand, or cause of action for such attorney's fee.

/s/ Kristina D. Cooksey

**PROOF OF SERVICE**

Under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, 735 ILCS § 5/1-109, the undersigned certifies that a copy of this Notice was served pursuant to Illinois Supreme Court Rule 11(c)(1) by personal service through a process server.

/s/ Kristina D. Cooksey